

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
NICKEISHA LAMEY SALMON : CASE NO. 5-14-01589
Debtor. :

JPMORGAN CHASE BANK, NA :
Movant, :
: :
vs. :
NICKEISHA LAMEY SALMON :
Respondents. :

**DEBTOR'S ANSWER TO MOTION FOR RELIEF FROM
AUTOMATIC STAY UNDER SECTION 362**

AND NOW COMES, Nickeisha Lamey Salmon, the Debtor, and files an Answer to
JPMorgan Chase Bank's Motion for Relief From the Automatic Stay:

1. Nickeisha Lamey Salmon (hereinafter the "Debtor") filed a Chapter 13 bankruptcy proceeding with the U.S. Bankruptcy Court for the Middle District of Pennsylvania.
2. Movant alleges that Debtor has failed to make post-petition mortgage payments.
3. Debtor fell behind on payments to the Movant, as she has complications from pregnancy and her husband was not working.
4. Debtor request that the Movant enter into a Stipulation placing the post-petition arrears in an amended Plan and/or allowing the Debtor to cure the arrears over a six (6) month period.
5. Movant is not entitled to relief from the automatic stay as the arrearage amount due has been paid or shall be paid through the Chapter 13 Plan, and/or a six (6) month Stipulation, and, therefore, the Movant is adequately protected.

WHEREFORE, the Debtor respectfully requests that Movant's Motion for Relief from the Automatic Stay be denied.

Respectfully submitted,

Date: September 14, 2016

/s/Tullio DeLuca
Tullio DeLuca, Esquire
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on September 14, 2016, he caused a true and correct copy of Debtor's Answer to JPMorgan Chase Bank's for Relief from the Automatic Stay to be served Via First Class United States Mail, Postage Pre-paid in the above-referenced case, on the following:

Charles J. DeHart, III, Esq. at dehartstaff@ramapo.com

Joshua Goldman, Esq. at jgoldman@kmllawgroup.com

Dated: September 14, 2016

/s/Tullio DeLuca
Tullio DeLuca, Esquire